

HELLA NORTH AMERICA, INC.

DEPT OF TRANSPORTATION

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Joseph V. Borruso  
President  
and  
Chief Executive Officer

March 21, 2001

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NHTSA-01-8677-47

National Highway Traffic Safety Administration  
Docket Management  
Room PL-401  
400 Seventh Street, S.W.  
Washington, DC 20590

Re: Docket No. NHTSA 2001-8677; Notice 1;  
Advance Notice of Proposed Rulemaking, Early Warning Reporting

Dear Sir or Madam:

In addition to supporting the comments made through the trade associations MEMA and OESA, Hella North America, Inc. ("Hella") would like to offer the following comments in response to the invitation for comments in the ANPRM noted above. Hella is a global supplier of automotive headlamps and electronic components with its head office in Lippstadt, Germany.

**GENERAL**

Hella has been committed to supplying safe, high quality automotive components for over 100 years, most notably, lighting devices which fall under FMVSS 108. It is not seeking ways to shirk this responsibility. Hella believes that the Act provides sufficient latitude to NHTSA to achieve its goals without burdening the automotive industry or itself with a flood of information of many types from multiple sources. That latitude is found in such saving provisions as section 3(b) of the Act amending section 30166 of title 49, in particular, subsection 4 (A) to (D).

**EXTRATERRITORIAL EFFECTS**

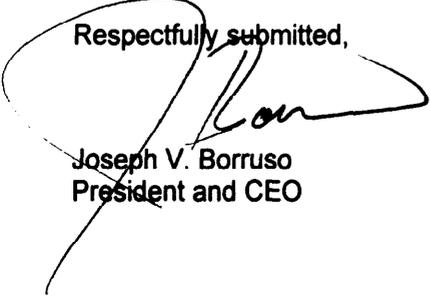
Hella, as a global supplier of automotive parts, sees more than simply the questionable extraterritoriality of the Act and potential regulations. The variety of legal systems in the world and the differences in the classification, evaluation, collection and availability of data worldwide all create uncertainty. NHTSA must specifically define the truly relevant categories of information reasonably obtainable on a global basis that respond to the key **early warning** objective of the Act. The administrative burden could otherwise be monumental and ultimately ineffective for all involved.

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**CONCLUSION**

Hella joins with MEMA and OESA in expressing its deep concerns about the direction the regulations may take. By this letter, it wishes to emphasize the importance attached to the issues raised. Hella firmly believes that Congress intended to grant the necessary latitude to NHTSA to achieve the early warning goal of the Act through an efficient and unburdened system.

Respectfully submitted,



Joseph V. Borruso  
President and CEO